

JOSEPH HARRINGTON
United States Attorney
Stephanie Van Marter
Assistant U.S. Attorney
Post Office Box 1494
Spokane, WA 99210-1494
(509) 353-2767

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESE DAVID CARILLO CASILLAS (2),
GABRIELA MENDOZA VASQUEZ (7),
BRITTANY LEE ZARAGOZA (10),
SALVADOR GUDINO CHAVEZ (11),
EDGAR OMAR HERRERA FARIAS
(16),
ALFREDO MAGANA GARIBAY (18),
JUAN BRAVO ZAMBRANO (19),
MIGUEL REYES GARCIA (21), and
JOSE ADRIAN MENDOZA(23),

Defendants.

4:15-CR-6049-EFS

Supplemental Notice of Expert
Witnesses, Drug Chemists and
Rule 16 Expert Summaries

Plaintiff, United States of America, by and through Joseph Harrington,

United States Attorney for the Eastern District of Washington and Stephanie Van Marter,
Assistant United States Attorney for the Eastern District of Washington, respectfully
submits the following Supplemental Notice of Expert Witnesses and Rule 16 Summaries.

Supplemental Notice of Expert Witnesses, Drug Chemists and
Rule 16 Expert Summaries - 1

Casillas.Notice.Expert.Amended.docx

1 The United States seeks to supplement its notice of expert as to the Drug Chemists
2 to include an additional report relative to Defendant Edgar Farias. Discovery as to this
3 information was provided to counsel on January 18, 2018, to include the Rule 16
4 materials from the Washington State Lab. The United States simply neglected to amend
5 the notice of expert earlier.
6

7 **WSP CHEMIST**

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9 Attached please find "Curricula Vitae" for Jason Trigg, previously disclosed as
10 Discovery pages 60000629-630. (See, Government's Exhibit A-4, Curriculum Vitae for
11 Jason Trigg). At trial, the United States intends to present the testimony and opinion of
12 WSP Chemist Jason Trigg in addition to those previously noted as it relates to the
13 following exhibits:
14

15 Drug Exhibits to Be Admitted:
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- 17 1. Items 6, 9, 15 and 16- Packaging and controlled substances seized
18 from the execution of search warrant by LEAD at 4873 E. Edison Rd.
19 Sunnyside WA. See, discovery pages 60000228-232.

20 More specifically, the United States will seek to admit their expert testimony as to
21 the chemical testing and analysis conducted on the above referenced samples submitted.
22 This expert testimony will include their opinion as to the type of controlled substance
23 present; the purity of controlled substance and how that relates to the overall weight of
24 each sample; the presence or lack of presence of any cutting agents; and the total weight
25
26

27 Supplemental Notice of Expert Witnesses, Drug Chemists and
28 Rule 16 Expert Summaries - 2

1 of each evidentiary item both in purity and mixture and substance of controlled substance
2 present. These proposed experts will also testify about their background and
3 qualifications, the commonly accepted scientific methodology followed in reaching their
4 conclusions as well as the peer review completed to test the accuracy of thier results.
5

6 DATED February 26, 2018
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8 JOSEPH H. HARRINGTON
9 UNITED STATES ATTORNEY

10 *s/Stephanie Van Marter*

11 Stephanie Van Marter

12 Assistant United States Attorney
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CERTIFICATION

I hereby certify that on February 26, 2018, I electronically filed the foregoing with the Clerk of the Court and counsel of record using the CM/ECF System.

Nicolas Vieth, nick@viethlaw.com

Victor Lara, vh_lara@hotmail.com

Gregory Scott, gregory@scottlaw.net

Peter Schweda, pschweda@wsmattorneys.com

Michael Felice, mike@mvfelicelaw.com

Richard Smith, rasmith@house314.com

Ken Therrien, kenntherrien@msn.com

Scott Johnson, scott@johnsonorr.com

Ricardo Hernandez, rick@rickhernandez.lawyer

s/Stephanie Van Marter

Stephanie Van Marter

Assistant United States Attorney